

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VONDOM, LLC,

Plaintiff,

vs.

CHRISTOPHER M. SUESS, TRUSTEE OF
CHRISTOPHER M. SUESS TRUST DATED
JANUARY 9, 2017; LUIS G. MOTA, TRUSTEE
OF LUIS G. MOTA TRUST DATED JANUARY
9, 2017; and ALTAMIRA COMPANY, LLC

Defendants.

Case No.: 20-cv-01157

Judge Sara L. Ellis

**PLAINTIFF VONDOM LLC'S
UNOPPOSED MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

By and through its current counsel and proposed new counsel of record, Plaintiff Vondom, LLC ("Plaintiff") moves this Court pursuant to L.R. 83.17 for leave to withdraw the appearance of Fausto Sanchez of Sanchez Fischer Levine LLP, and substitute Kenneth A. Linzer of Linzer Law Group, P.C. as its lead and trial counsel. Daniel O. Herrera of Cafferty Clobes Meriwether & Sprengel LLP will continue to serve as Plaintiff's local counsel. In support of this motion, Plaintiff states as follows:

1. Attorney Fausto Sanchez of Sanchez Fischer Levine LLP, 1200 Brickell Avenue, Suite 750, Miami, Florida 33131, has appeared on behalf of Plaintiff as lead and trial counsel. (ECF No. 9.) For the reasons elaborated upon in Plaintiff's earlier Agreed Motion for Extension of Briefing Deadlines, (ECF No. 23), Mr. Sanchez cannot continue to represent Plaintiff.

2. Plaintiff has retained Kenneth A. Linzer of Linzer Law Group, P.C., 12100 Wilshire Blvd, Suite 1090, Los Angeles, CA 90025, in place of Mr. Sanchez. Mr. Linzer is admitted to

practice before this Court. Upon leave of Court, Mr. Linzer will file an appearance on behalf of Plaintiff.

3. No trial date has been set for this matter. Therefore, granting this motion will not prejudice any party or cause undue delay. In fact, Plaintiff still intends to file its response in opposition to Defendants' pending Motion to Dismiss, Transfer or Stay, (ECF No. 20), by the current September 14, 2020 deadline.

4. Counsel for Plaintiff have conferred with counsel for Defendants, who have indicated that Defendants do not oppose this motion.

WHEREFORE, Plaintiff respectfully requests that this Court grant the foregoing motion for withdrawal and substitution of counsel.

Date: September 11, 2020

Respectfully submitted,

/s/ Daniel O. Herrera

Daniel O. Herrera

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/s/ Kenneth A. Linzer

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Daniel O. Herrera, an attorney, hereby certify that on September 11, 2020, service of *Plaintiff Vondom LLC's Unopposed Motion for Withdrawal and Substitution of Counsel* was accomplished pursuant to ECF as to Filing Users and I shall comply with LR 5.5 as to any party who is not a Filing User or represented by a Filing User.

s/ Daniel O. Herrera

Daniel O. Herrera